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**ATTORNEYS FOR PENDER CAPITAL  
ASSET BASED LENDING FUND I, LP**

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**In re:**

**MANSFIELD BOAT AND RV  
STORAGE, LLC**

**Debtor.**

§  
§ **Chapter 7**  
§  
§ **Case No. 18-33926**  
§  
§  
§

**PENDER CAPITAL ASSET BASED LENDING FUND I, LP'S  
OBJECTION TO LARRY REYNOLDS' MOTION FOR CONTINUANCE OF  
MARCH 5, 2020 EVIDENTIARY HEARING  
(Responds to Docket No. 236)**

Pender Capital Asset Based Lending Fund I, LP ("Pender") files its Objection (the "Objection") to *Larry Reynolds' Motion for Continuance* [Docket No. 236] (the "Motion to Continue").

**I. OBJECTION**

1. Pender strongly objects to further delay. Mr. Reynolds is again attempting to derail and avoid the Court's hearings. The Court orally called for a follow-up hearing at the January 29, 2020 hearing as follows:

Mr. Seidel, there is a requirement, if you would, that if you would get a setting, like the one this morning, toward the end of next month, that gives Mr. Reynolds plenty of time to do the things he had testified he was going to be able to do: the sales of the house and/or the note and the payment over to you of the amounts that are owed under the court order.

January 29 Hearing Transcript at 16:21–25, 17:1–2.

2. Mr. Seidel duly noticed the March 5, 2020 hearing and sent notice to Mr. Reynolds pursuant to the Notice of Hearing and Certificate of Service filed on February 20, 2020 [Docket No. 227].

3. As this Court is aware, Mr. Reynolds has a history of noncompliance and perjury before this Court, including attempts to avoid hearings based on alleged medical issues. Mr. Reynolds' alleged doctor's note from Dr. Arnold J. Morris III, DO is hearsay and has not been authenticated.

4. While Pender does not excuse Mr. Reynolds' absence, his attendance at the March 5, 2020 Hearing is not necessary. Whether or not Mr. Reynolds attends, Pender is prepared to present evidence of Mr. Reynolds' false statements and noncompliance with this Court's orders.

5. In addition, the motion implicitly acknowledges Mr. Reynolds false statements to this Court. He references getting permission from another court to transfer the commercial property in Alaska to his wife, Janice. Mr. Reynolds has previously testified that Janice owned such property.

6. Mr. Reynolds' motion is also inconsistent in that it seeks a continuance because he is allegedly sick, but apparently also because he is traveling to Washington for a court hearing.

## **II. CONCLUSION**

7. Pender respectfully requests that this Court deny Reynolds' request for continuance of the March 5, 2020 hearing, allow Pender to present evidence of Mr. Reynolds' false statements

and noncompliance with this Court's orders, and grant Pender any such other and further relief to which it may be entitled.

**Dated: March 4, 2020.**

Respectfully submitted,

By: /s/ Eric M. English

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**CERTIFICATE OF SERVICE**

I certify that I caused the foregoing notice to be served on March 4, 2020, to the parties listed on the attached service list via United States mail, postage prepaid, or via electronic service.

/s/ Eric M. English

Eric M. English

**SERVICE LIST**

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